

**THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

Rockefeller Photos, LLC,

Plaintiff,

v.

Julie's Elmwood Park LLC, *et al.*,

Defendants.

Case No. 1:25-cv-04794

Dist. Judge Manish S. Shah

Mag. Judge Jeffrey T. Gilbert

**DEFENDANTS JULIE'S ELMWOOD PARK LLC AND MARC PACIONE'S
UNOPPOSED MOTION TO SET ASIDE ENTRY OF DEFAULT UNDER RULE 55(c)**

Defendants Julie's Elmwood Park LLC ("JEP") and Marc Pacione ("Pacione"), by their counsel, respectfully submit this Unopposed Motion to Set Aside Entry of Default against each of JEP and Pacione, pursuant to Federal Rule of Civil Procedure 55(c) ("Motion"). Prior to the filing of the Motion, Defendants' counsel has been in contact with Plaintiff's counsel. Defendants' counsel has presented to Plaintiff's counsel reasoning as to why Defendants' counsel believes that good cause exists to set aside the entries of default against JEP and Pacione, as well as the meritorious defenses that JEP and Pacione may be able to assert. In addition, each of JEP and Pacione would be moving to set aside the entry of default sufficiently quickly, with JEP doing so within five weeks after entry of default and Pacione doing so within two weeks. Plaintiff's counsel has indicated to Defendants' counsel that Plaintiff is amenable to setting aside the entry of default and does not oppose this Motion.

In exchange, Defendants' counsel has agreed to accept service of process on behalf of Defendant Jullite Harb. Plaintiff's counsel has indicated that Plaintiff is amenable to all Defendants having 30 days to respond to the First Amended Complaint.

Based on the foregoing, JEP and Pacione respectfully request that the Court set aside the entries of default against them.

Dated: August 8, 2025

Respectfully submitted,

ZLATKIN CANN ENTERTAINMENT

By: /s/ Ilya G. Zlatkin

Ilya G. Zlatkin

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LLC, Jullite Harb, and Marc Pacione*